



**FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD**

APPELLANT: Nick Andrews
DOCKET NO.: 17-20719.001-R-1 through 17-20719.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Nick Andrews, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld and Associates, LLC in Chicago, and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds ***a reduction*** in the assessment of the property as established by the **Cook** County Board of Review is warranted. The correct assessed valuation of the property is:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
17-20719.001-R-1	01-01-120-024-0000	911	505	\$1,416
17-20719.002-R-1	01-01-120-021-0000	4,138	36,862	\$41,000

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Cook County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2017 tax year. The Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of the appeal.

Findings of Fact

The subject property consists of two parcels, one of which is improved with a two-story dwelling of stucco exterior construction with 2,802 square feet of living area. The dwelling is approximately 91 years old. Features of the home include a full unfinished basement, central air conditioning and two fireplaces. Parcel 01-01-120-021-0000 has an approximately 8,712 square foot site and is located in Barrington, Barrington Township, Cook County. Neither party provided descriptive information for parcel 01-01-120-024-0000. The subject parcels are classified as class 2-01 and class 2-06 properties under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation as to the class 2-06 improved parcel; no dispute was raised concerning the valuation of the class 2-01 parcel. In support of the argument, the appellant submitted a brief along with a copy of a Settlement Statement. The Settlement

Statement depicts that the property with a street address of 506 South Hough Street was sold by Nancie K. Kozel and purchased by the appellant on September 15, 2016 for a price of \$410,000. Based on this evidence, the appellant requested a reduction in the assessment of parcel 01-01-120-021-0000 to \$41,000 in order to reflect the entire purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject parcels of \$55,093. The subject's assessment reflects a market value of \$550,930, land included, when using the level of assessments for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment the board of review submitted information on four comparables with equity data. As the basis of this appeal is overvaluation, the Board finds this evidence is not responsive and will not further analyze the data. However, as part of its grid analysis, the board of review did depict that parcel 01-01-120-021-0000 last sold in September 2016 for \$399,996.

Based on the foregoing evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellant contends the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. 86 Ill.Admin.Code §1910.63(e). Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales or construction costs. 86 Ill.Admin.Code §1910.65(c). The Board finds the appellant met this burden of proof and a reduction in the assessment of parcel 01-01-120-021-0000 is warranted.

The Board finds the only evidence of market value to be the purchase of the property located at 506 S. Hough Street in September 2016 for a price of \$410,000. The appellant provided evidence of the sale. There is no apparent indication that the parties to the transaction were related and the board of review acknowledged that the property sold for approximately \$399,996 in September 2016.

On this limited record, the Board finds the purchase price of \$410,000 is below the market value reflected by the assessment of \$550,930. Furthermore, the Board finds the board of review did not present any evidence to challenge the arm's length nature of the transaction, to refute the contention that the purchase price was reflective of market value and/or provide comparable sales evidence indicating that the subject's estimated market value based upon its assessment is supported by similar sales.

Based on this limited record, the Board finds that a reduction in the assessment of the class 2-06 parcel known as 01-01-120-021-0000 commensurate with the appellant's request is appropriate.

This is a final administrative decision of the Property Tax Appeal Board which is subject to review in the Circuit Court or Appellate Court under the provisions of the Administrative Review Law (735 ILCS 5/3-101 et seq.) and section 16-195 of the Property Tax Code. Pursuant to Section 1910.50(d) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(d)) the proceeding before the Property Tax Appeal Board is terminated when the decision is rendered. The Property Tax Appeal Board does not require any motion or request for reconsideration.



Chairman



Member



Member

Member



Member

DISSENTING: _____

CERTIFICATION

As Clerk of the Illinois Property Tax Appeal Board and the keeper of the Records thereof, I do hereby certify that the foregoing is a true, full and complete Final Administrative Decision of the Illinois Property Tax Appeal Board issued this date in the above entitled appeal, now of record in this said office.

Date: July 20, 2021



Clerk of the Property Tax Appeal Board

IMPORTANT NOTICE

Section 16-185 of the Property Tax Code provides in part:

"If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel after the deadline for filing complaints with the Board of Review or after adjournment of the session of the Board of Review at which assessments for the subsequent year or years of the same general assessment period, as provided in Sections 9-125 through 9-225, are being considered, the taxpayer may, within 30 days after the date of written notice of the Property Tax Appeal Board's decision, appeal the assessment for such subsequent year or years directly to the Property Tax Appeal Board."

In order to comply with the above provision, YOU MUST FILE A PETITION AND EVIDENCE WITH THE PROPERTY TAX APPEAL BOARD WITHIN 30 DAYS OF THE DATE OF THE ENCLOSED DECISION IN ORDER TO APPEAL THE ASSESSMENT OF THE PROPERTY FOR THE SUBSEQUENT YEAR OR YEARS. A separate petition and evidence must be filed for each of the remaining years of the general assessment period.

Based upon the issuance of a lowered assessment by the Property Tax Appeal Board, the refund of paid property taxes is the responsibility of your County Treasurer. Please contact that office with any questions you may have regarding the refund of paid property taxes.

PARTIES OF RECORD

AGENCY

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Nick Andrews, by attorney:
Robert Rosenfeld
Robert H. Rosenfeld and Associates, LLC
33 North Dearborn Street
Suite 1850
Chicago, IL 60602

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602